## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Christopher A. Tucker : Chapter 13

:

Case No. 21-12124-ELF

Debtor (s)

## MOTION TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 13

Debtor, Christopher A. Tucker, by and through Attorney Brad J. Sadek, hereby moves this Honorable Court for an Order allowing Debtor's case to be converted from Chapter 7 to Chapter 13 and avers the following:

- 1. Debtor filed for relief under Chapter 7 of the Bankruptcy code on July 30, 2021.
- 2. The above-captioned case was filed as an Emergency to prevent the shut off of the debtor's utilities.
- 3. Upon completion of the debtor's schedules, it was determined that the debtor had excess income.
- 4. The Debtor wishes to convert their bankruptcy to a Chapter 13 in order to properly comply with feasibility recommendations of the Standing Chapter 13 Trustee.
- 5. Debtor shall additionally file a Chapter 13 Plan, and the necessary Amended Schedules to proceed under Chapter 13 of the Bankruptcy Code.

**WHEREFORE**, the Debtor requests an Order allowing his case to be converted from Chapter 7 to Chapter 13 Bankruptcy.

Dated: August 29, 2021 /s/Brad J. Sadek, Esq

Brad J. Sadek, Esq. Attorney for Debtor 1315 Walnut Street Suite #502 Philadelphia, PA 19107